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Attorneys for Defendants William E. and Desiree B. Moore
Revocable Trust; Trustees of The William E. and Desiree B. Moore
Revocable Trust; Desiree B. Moore Revocable Trust;
William E. Moore Marital Trust; William E. Moore
Generation-Skipping Trust; and Desiree Moore

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO AND OAKLAND DIVISION

THOMAS FERNANDEZ, LORA SMITH and
TOSHA THOMAS, individually and on behalf of
a class of all other persons similarly situated,

Plaintiffs,

VS.

K-M INDUSTRIES HOLDING CO., INC.; K-M INDUSTRIES HOLDING CO., INC. ESOP PLAN COMMITTEE; WILLIAM E. AND DESIREE B. MOORE REVOCABLE TRUST; TRUSTEES OF THE WILLIAM E. AND DESIREE B. MOORE REVOCABLE TRUST; CIG ESOP PLAN COMMITTEE; NORTH STAR TRUST COMPANY; DESIREE B. MOORE REVOCABLE TRUST; WILLIAM E. MOORE MARITAL TRUST; WILLIAM E. MOORE GENERATION-SKIPPING TRUST; and DESIREE MOORE, BOTH IN HER INDIVIDUAL CAPACITY AND AS TRUSTEE OF THE WILLIAM E AND DESIREE B. MOORE REVOCABLE TRUST'S SUCCESSOR TRUSTS NAMED ABOVE.

Defendants.

DEFENDANTS WILLIAM E. AND
DESIREE B. MOORE REVOCABLE
TRUST, TRUSTEES OF THE
WILLIAM E. AND DESIREE B.
MOORE REVOCABLE TRUST,
DESIREE B. MOORE REVOCABLE
TRUST, WILLIAM E. MOORE
MARTIAL TRUST, WILLIAM E.
MOORE GENERATION-SKIPPING
TRUST AND DESIREE B. MOORE'S
ADMINISTRATIVE MOTION FOR
AN ORDER TO REMOVE
PORTIONS OF EXHIBITS 1 AND 2
TO THE SUPPLEMENTAL
DECLARATION OF CAROLINE M.
WALTERS (DOCKET NO. 207)
FROM THE PUBLIC RECORD AND
PLACE REMOVED PORTIONS OF
EXHIBITS UNDER SEAL

CIVIL LOCAL RULES 7-11, 79-5

1 **TO EACH PARTY AND THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE THAT pursuant to Local Rules 7-11 and 79-5 of the Northern
 3 District of California, Defendants William E. and Desiree B. Moore Revocable Trust, Trustees of
 4 the William E. and Desiree B. Moore Revocable Trust, Desiree B. Moore Revocable Trust, William
 5 E. Moore Marital Trust, William E. Moore Generation-Skipping Trust, and Desiree B. Moore
 6 (“Moore Trust Defendants”), by and through their undersigned counsel of record, hereby move for
 7 an administrative order removing from the public record and placing under seal portions of Exhibits
 8 1 and 2 to the Supplemental Declaration Of Caroline M. Walters In Support Of Combined Reply
 9 (Docket No. 207) (“Supplemental Walters Declaration”).

10 As explained in detail in the Declaration of Terrence F. Young, filed herewith, co-defendants
 11 K-M Industries Holding Co., Inc., K-M Industries Holding Co., Inc. ESOP Plan Committee, and
 12 CIG ESOP Plan Committee consider the following portions of the exhibits to the Supplemental
 13 Walters Declaration to be confidential:

14 Exhibit No. 1: pages 205 and 206 of Deposition of Stephen Ferrari.

15 Exhibit No. 2: pages 128 and 132 of Deposition of Joseph Cristiano
 16 Thus, this information should not be filed in the public record and instead should be filed under seal.

17 For these reasons the Moore Trust Defendants request that portions of Exhibits 1 and 2 to the
 18 Supplemental Walters Declaration be removed from the public record and filed under seal.

19 DATED: July 21, 2008

HENNIGAN, BENNETT & DORMAN

21 By: _____/S/
 22 Caroline M. Walters

23 Attorneys for Defendants
 24 WILLIAM E. AND DESIREE B. MOORE
 25 REVOCABLE TRUST; TRUSTEES OF THE
 26 WILLIAM E. AND DESIREE B. MOORE
 27 REVOCABLE TRUST; DESIREE B. MOORE
 28 REVOCABLE TRUST; WILLIAM E. MOORE
 MARITAL TRUST; WILLIAM E. MOORE
 GENERATION-SKIPPING TRUST; and
 DESIREE MOORE